

U.S. Department of Justice
Washington, DC 20530

OMB No. 1124-0002; Expires April 30, 2017

Supplemental Statement

**Pursuant to the Foreign Agents Registration Act of
1938, as amended**

For Six Month Period Ending 12.31.14

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Blank Rome Government Relations (BRGR)

6025

(c) Business Address(es) of Registrant

Watergate Office Building
600 New Hampshire Avenue N.W.
12th Floor
Washington, DC 20037

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
See Attachment 1		

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
David I. Reader	185 Tara Woods Drive Bumpass, VA 23024	USA	Of Counsel	10.13.14

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

N/A

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal

Date of Termination

See infra question 11 - BRGR is terminating its representation of TCM, and, therefore, this supplemental statement serves as BRGR's final statement.

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐

Exhibit B⁴ Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

BRGR did not engage in any activities for or render any services to TCMI during this reporting period, or from the end of the reporting period to the date of this filing. Moreover, BRGR does not intend to render any future services to TCMI. Therefore, this supplemental statement serves as BRGR's final statement pursuant to 28 C.F.R. section 5.205.

We note that Blank Rome LLP, an affiliate of BRGR, may serve as legal counsel to TCMI in certain matters before U.S. governmental agencies and federal courts, and may provide other legal services to TCMI in the future. Such services fall under the exemption provided in 22 U.S.C. section 613(g), however, and do not require FARA registration.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
9.8.14	Administrative Control Services, Inc.	Payment of FARA filing fees	\$305
		Payment of costs of preparing FARA filing	\$1,345.50

\$1,650.50

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D⁸ to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(c)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☐

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
7.30.14	FARA Registration Unit	Filing Fees	\$305.00

\$305.00

Total

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(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See Attachment
2 for
contributions
made by Blank
Rome PAC

Individual
contributions by
short form
registrants:

J. Waldron	\$750 - \$125 monthly \$500 - 9.29.14	Blank Rome PAC Tom Wolf for Governor	
S. Peranich	\$1,248 - \$104 biweekly \$500 - 9.18.14	Blank Rome PAC Big Easy Committee	
J. Grasso	\$500 - 9.9.14 \$500 - 9.26.14 \$250 - 10.28.14	Tom Corbett for Governor Tom Wolf for Governor Parnell-Sullivan for Governor/LtGov	

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) N/A

Electronic Communications

- ☐ Email
☐ Website URL(s): _____
☐ Social media websites URL(s): _____
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

January 30, 2015

/s/ Stephen Peranich

eSigned

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

ATTACHMENT 1

Question 4(a):

Name	Position	Date Connection Ended
Raymond G. Mullady	Partner	8.31.14
Joseph O. Click	Of Counsel	9.19.14
Thomas J. Poulin	Partner	10.5.14
W. Scott Simmer	Partner	10.5.14
Cynthia S. Brown	Principal	12.31.14
Ashley E. Davis	Managing Principal	12.31.14
Malloy McDaniel	Principal	12.31.14
Kristi L. Remington	Principal/Of Counsel	12.31.14
Shimon A. Stein	Principal	12.31.14

ATTACHMENT 2

Blank Rome PAC - 2014 Budget

Committee	Date	Amount	Last Name	First Name	State	CH
Kathleen Rice for Congress	7/8/2014	\$1,000	Rice	Kathleen	D-NY-12	H
Dutch Ruppersberger for Congress	7/8/2014	\$1,000	Ruppersberger	Dutch	D-MD-2	H
Young for Iowa, Inc.	7/8/2014	\$1,000	Young	David	R-IA-3	H
Beatty for Congress	7/16/2014	\$1,000	Beatty	Joyce	D-OH-3	H
Roskam for Congress	7/16/2014	\$1,000	Roskam	Peter	R-IL-6	H
Democratic Congressional Campaign Committee	7/16/2014	\$5,000				
Democratic Senatorial Campaign Committee	7/16/2014	\$5,000				
Kaine for Virginia	7/21/2014	\$1,000	Kaine	Tim	D-VA	S
Rob Portman for US Senate	7/21/2014	\$1,000	Portman	Rob	R-OH	S
Volunteers for Shimkus	7/21/2014	\$1,500	Shimkus	John	R-IL-5	H
Kind for Congress Committee	7/24/2014	\$1,000	Kind	Ron	D-WI-3	H
Hoeven for Senate	7/24/2014	\$1,000	Hoeven	John	R-ND	S
Alaskans for Begich 2014	8/5/2014	\$1,000	Begich	Mark	D-AK	S
Stutzman for Congress	8/5/2014	\$1,000	Stutzman	Marlin	R-IN-3	H
Democrats Win Seats PAC	8/14/2014	\$1,000	Wasserman Schultz	Debbie	D-FL-20	H
Ohio Pennsylvania Victory Fund	8/15/2014	\$4,000	OH PA Victory Fund		D	
Ami Bera for Congress	9/8/2014	\$1,000	Bera	Ami	D-CA-7	H
Friends of Mary Landrieu	9/8/2014	\$1,000	Landrieu	Mary	D-LA	S
Dan Coats for Indiana	9/8/2014	\$1,000	Coats	Dan	R-IN	S
Thornberry For Congress Committee	9/8/2014	\$1,000	Thornberry	Mac	R-TX-13	H
Tuesday Group PAC	9/8/2014	\$2,500	Tuesday Group PAC			
Friends of Susan Brooks	9/9/2014	\$1,000	Brooks	Susan	R-IN-5	H
Patrick Murphy for Congress	9/11/2014	\$1,000	Murphy	Patrick	D-FL-18	H
Pallone for Congress	9/11/2014	\$1,000	Pallone	Frank	D-NJ-6	H
Schneider for Congress	9/11/2014	\$1,500	Schneider	Brad	D-IL-10	H
Chris Coons for Delaware	9/15/2014	\$2,000	Coons	Chris	D-DE	S
Courtney for Congress	9/15/2014	\$1,000	Courtney	Joe	D-CT-2	H
Friends of Rosa DeLauro	9/15/2014	\$1,000	DeLauro	Rosa	D-CT-3	H
Himes for Congress	9/15/2014	\$1,000	Himes	Jim	D-CT-4	H
People for Derek Kilmer	9/15/2014	\$1,000	Kilmer	Derek	D-WA-6	H
Scott Peters for Congress	9/15/2014	\$1,000	Peters	Scott	D-CA-52	H
Reed Committee	9/15/2014	\$2,000	Reed	Jack	D-RI	S
Tim Ryan for Congress	9/15/2014	\$1,000	Ryan	Tim	D-OH-17	H
Steve Daines for Montana	9/15/2014	\$1,000	Daines	Steve	R-MT	H
Grassley Committee Inc.	9/15/2014	\$1,000	Grassley	Chuck	R-IA	S
Mark Pryor for US Senate	9/17/2014	\$1,000	Pryor	Mark	D-AR	S
Kyrsten Sinema for Congress	9/17/2014	\$1,000	Sinema	Kyrsten	D-AZ-9	H
Kurt Schrader for Congress	9/30/2014	\$1,000	Schrader	Kurt	D-OR-5	H
Democratic Senatorial Campaign Committee	9/30/2014	\$5,000				
Friends of John Barrow	10/17/2014	\$1,000	Barrow	John	D-GA-12	H
Mark Pryor for US Senate	10/28/2014	\$1,000	Pryor	Mark	D-AR	S
Grassley Committee Inc.	11/11/2014	\$1,000	Grassley	Chuck	R-IA	S
Heller for Senate	12/8/2014	\$1,000	Heller	Dean	R-NV	S
The Thom Tillis Committee	12/8/2014	\$1,000	Tillis	Thom	R-NC	H